

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

ORDER GRANTING FOUR HUNDRED NINTH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY TO  
SUBSEQUENTLY AMENDED CLAIMS

Upon the *Four Hundred Ninth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Subsequently Amended Claims* [ECF No. 19557] (the “Four Hundred Ninth Omnibus Objection”),<sup>2</sup> filed by the Puerto Rico Electric Power Authority (“PREPA”), dated December 17, 2021, for entry of an order disallowing in their entirety certain

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Ninth Omnibus Objection.

claims filed against PREPA, as more fully set forth in the Four Hundred Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Amended Claims” in Exhibit A (collectively, the “Remaining Amended Claims”); and the Court having determined that the relief sought in the Four Hundred Ninth Omnibus Objection is in the best interests of PREPA, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Ninth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Four Hundred Ninth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors’ right to object to the Remaining Claims on any grounds whatsoever is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 19557 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Four Hundred Ninth Omnibus Objection**

## FOUR HUNDRED NINTH OMNIBUS OBJECTION

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## Exhibit A – Subsequently Amended Claims

CLAIMS TO BE DISALLOWEDREMAINING AMENDED CLAIMS

	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
1	ISMAEL L. PURCELL SOLER AND ALYS COLLAZO BOUGEOIS C/O RAMÓN ORTIZ PALMIERI PO BOX 331429 PONCE, PR 00733-1429	5/3/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	8987	\$61,512.00	ISMAEL PURCELL SOLER Y ALYS COLLAZO URB. JACARANDA, 35271 CALLE CLAVELINA PONCE, PR 00730	5/3/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	179486	\$50,700.00
	Reason: Amended and superseded by a later filed Proof of Claim									
2	MARTINEZ GARCIA, JORGE AVENIDA SANTA JUANITA AK-12 SANTA JUANITA BAYAMON, PR 00956	5/22/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	19895	\$10,000.00	MARTINEZ GARCIA, JORGE AVENIDA SANTA JUANITA AK-12 SANTA JUANITA BAYAMON, PR 00956	7/21/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	177629	\$230,000,000.00
	Reason: Amended and superseded by a later filed Proof of Claim									